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July 31, 2013

*Via Electronic Filing*

Ms. Marlene H. Dortch, Secretary  
Federal Communications Commission  
Office of the Secretary  
445 12th Street, SW  
Washington, D.C. 20554

Re: Ex Parte Notice, PS Docket No. 13-87, WT Docket No. 96-86, RM-11433, PS Docket No. 06-229, RM-11577

Dear Ms. Dortch:

Harris Corporation (Harris) submits further information to the Federal Communications Commission (Commission) in the above-referenced proceeding.<sup>1</sup> Specifically, Harris offers additional guidance on the need for creation of a waiver policy for the December 31, 2016 deadline for 700 MHz narrowband licensees to complete the narrowbanding process to accommodate unique operational, technical and financial considerations of licensees who have been early implementers of 700 MHz narrowband systems in general use and statewide set-aside spectrum. Such a policy must ensure that entities reliant upon vehicle based repeaters are provided a waiver from the deadline due to the absence of commercially available products today that satisfy the pending 6.25 kHz spectrum efficiency requirements.

As noted in Harris' comments in this proceeding, standards and products exist for wide area operation in the 700 MHz band that are compliant to the future 6.25 kHz efficiency requirement. There are several 6.25 kHz efficiency technologies available for the 700 MHz narrowband general use and statewide set aside spectrum, and many of these technologies have been successfully implemented in such systems throughout the nation.<sup>2</sup> Thus, there may not be a basis for a blanket waiver based upon a lack of technology accommodating wide area operation.

However, no products currently exist for vehicle based repeaters that meet 6.25 kHz efficiency requirements. This lack of availability has placed some entities, such as the Virginia State Police, in the position of needing a waiver due to their heavy reliance upon vehicle based repeaters.

It is in these very circumstances that Harris believes it is vital that the Commission must allow a waiver of the narrowbanding deadlines. Consistent with our recommendations for a liberal waiver process for early adopters that considers specific circumstances and challenges for compliance, the Commission should permit agencies like the Virginia State Police to continue to use existing products that meet the current 12.5 kHz efficiency requirement for vehicle repeater applications for a prescribed timeframe, pending availability of vehicle repeater products that satisfy the 6.25 kHz requirement.

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<sup>1</sup> See Proposed Amendments to the Service Rules Governing Public Safety Narrowband Operations in the 769-775/799-805 MHz Bands, PS Docket No. 13-87, Notice of Proposed Rule Making, FCC 13-40 (2013) (700 MHz Narrowband NPRM).

<sup>2</sup> See Harris Comments, 700 MHz Narrowband NPRM at 7 (filed June 18, 2013).

Respectfully submitted,

\_\_\_\_\_/s/\_\_\_\_\_  
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Patrick Sullivan  
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Harris Corporation